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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

LEEANNE MAXFIELD, an individual, and on behalf of all others similarly situated; JAY CLAYTON, an individual, and on behalf of all others similarly situated; CHEREE KAHRS, an individual, and on behalf of all others similarly situated; JODI ROWLEY, an individual, and on behalf of all others similarly situated; BARBARA ADAMS, an individual, and on behalf of all others similarly situated; MICHAEL WYRICK, an individual, and on behalf of all others similarly situated; VICTORIA BOWER, an individual, and on behalf of all others similarly situated; HEATHER DAWN HART, an individual, and on behalf of all others similarly situated; BOYD BROTHERSEN, an individual, and on behalf of all others similarly situated; SAMMI WILCOX, an individual, and on behalf of all others similarly situated; ALISON CICALA, an individual, and on behalf of all others similarly situated; CALVIN OCKEY, an individual, and on behalf of all others similarly

**FOURTH STIPULATED MOTION TO
EXTEND DISCOVERY DEADLINES**

Case No. 4:21-cv-00099-DN-PK

<p>situated; LISA OCKEY, an individual, and on behalf of all others similarly situated.</p> <p>Plaintiffs,</p> <p>v.</p> <p>UTAH DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL, as a subdivision and/or agency of the STATE OF UTAH; CADE MEIER an individual; TIFFANY CLASON, an individual; JEFF L. COLVIN, an individual; SALVADOR PETILOS, an individual; ANGELA MICKLOS, an individual; RUTHANNE OAKLEY FROST, an individual; TIM BEARDALL, an individual; MAN DIEP, an individual; JOHN BARRAND, an individual; and DOES 1-10, inclusive;</p> <p>Defendants.</p>	
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The parties, by and through their respective counsel, hereby stipulate to and jointly move for entry of a Fourth Amended Scheduling Order extending the current discovery deadline to March 7, 2025, with similar extension of all related deadlines (including the trial date). Consistent with the requirements of Fed. R. Civ. P. 7 and DUCivR 7-1(a)(2)(A), this motion is being made prior to the expiration of all current discovery-related deadlines. At present, the last day to serve written discovery was March 4, 2025, with the fact discovery expiring March 7, 2025. This extension, which seeks to move these deadlines to July 1, 2025 and August 1, 2025, respectively, will provide the parties with the time they need to complete all discovery work.

There is good cause to grant this motion. The parties have been diligent in conducting discovery. Initial disclosures have been exchanged, some written discovery has been propounded and answered, and the parties have deposed some witnesses and are working to depose additional witnesses. The parties have also been courteous in granting extensions of time for responses,

especially in light of the extensive volumes of documents and the broad scope implicating numerous named parties. Nevertheless, the parties agree that additional time for fact discovery is warranted, both as it regards written discovery and depositions.

The parties continue to work through the discovery process collaboratively and have been able to resolve issues as they arise without involvement from the Court, including deposition scheduling and rescheduling, scope of document requests, privilege issues, etc. Because of the extensive nature of written discovery, and the fact that parties on both sides have been occupied (for some extensively) with the state legislative session that concludes today, March 7, 2025, several anticipated depositions for both sides remain outstanding. Finally, Plaintiffs' motion to conditionally certify the collective is still pending, which means that the posture and full scope of this litigation is still uncertain.

For all these reasons, the parties request this Court to allow them the needed discovery extension, as stated here and in the attached proposed Order.

DATED this 7th day of March, 2025.

PIA HOYT, LLC
/s/ Erika Larsen
Erika M. Larsen
*Attorneys for Plaintiffs and Collective
Representatives*

OFFICE OF THE UTAH ATTORNEY
GENERAL

/s/ Jaqualin Friend Peterson
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